

IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF VIRGINIA  
ALEXANDRIA DIVISION

ESVIN GOMEZ.,

Plaintiff,

v.

SEOUL GOOL DAE GEE INC,

Defendant.

Case No. 1:19-cv-01121-CMH-TCB

**DECLARATION OF NINA Y. REN**

I, Nina Yuanyuan Ren, am over the age of 18 and am competent to testify about the matters herein.

1. I make this Declaration in support of a fee request in the above-captioned matter by attorney Lenore C. Garon.

**My Qualifications**

2. I am a duly licensed attorney practicing in the District of Columbia and Virginia. I have been a member in good standing of the Virginia Bar since October 31, 2013 and the D.C. Bar since December 8, 2014. I am admitted to practice law in the U.S. District Court for the Eastern District of Virginia, the U.S. District Court for the Western District of Virginia, the U.S. District Court of the District of Columbia, the U.S. Court of Federal Claims, and the U.S. Court of Appeals for the Fourth Circuit.

3. I received my Juris Doctor from Washington and Lee University School of Law in May 2013. While attending W&L Law, I was a student attorney for the W&L Black Lung Clinic for my third academic year. I received a Bachelor of Arts degree, *cum laude*, double majoring in History and Philosophy, from Rutgers, the State University of New Jersey, in May 2009.

4. I have been practicing law since December 2013. From May 2014 through the present, I have served as an associate attorney with Kalijarvi, Chuzy, Newman & Fitch, P.C. Prior to joining the firm, I was an associate attorney with Gebhardt & Associates, LLC, a D.C. firm specializing in federal employment law.

5. I am a member of the Metropolitan Washington Employment Lawyers Association, Co-chair of the Membership Committee of the D.C. Women's Bar Association, and a member of the D.C. Bar's Labor and Employment Section.

6. I handle primarily employment matters—such as discrimination and whistleblower retaliation claims—before administrative bodies (Equal Employment Opportunity Commission (EEOC), the Merit Systems Protection Board (MSPB), and the Office of Special Counsel (OSC)) as well as employment litigation in D.C. state court and federal courts in D.C. and Virginia. I also practice before the Defense Office of Hearings and Appeals (DOHA) on security clearance matters.

7. I am a member of the Bar of this court and of the Virginia State Bar.

Reasonableness of Counsel's Requested Rates

8. I have been asked to opine on the reasonableness of the hourly rates proposed by plaintiffs' counsel in the above-captioned case. I have known Lenore Garon since approx. 2012, when I was a law student working as a summer law clerk at Gebhardt and Associates, LLP. I am also a member of MWELA with Ms. Garon. I am familiar with her experience as an attorney and, in general terms, with her work as an attorney. I have not participated in this case in any way (except for providing this Declaration).

9. Because most of my litigation work is done under the civil rights laws, many of which permit fee-shifting, I try to keep abreast of current hourly rates billed by other civil rights attorneys in the Eastern District of Virginia and fee rates that have been approved by district courts in the Eastern District of Virginia in such cases.

10. Craig Reilly, a local defense attorney, has compiled a matrix of fees charged in recent years within the local bar. His matrix is consistent with my understanding of local rates for complex federal litigation, of which civil rights and employment claims, with their discovery demands and their unusually extensive and potent affirmative defenses, decidedly are for plaintiffs' counsel. Mr. Reilly's matrix has been cited with approval by Judge Lee in *Vienna Metro LLC v. Pulte Home Corp.*, no. 1:10-cv-00502-GBL-TCB (E.D. Va. Aug. 24, 2011), by Judge Buchanan in *MiTile, Ltd. v. Hasbro, Inc.*, No. 1:13cv451, 2013 U.S. Dist. LEXIS 143926, at \*3 (E.D. Va. Oct. 3, 2013), and by Judge Lee again in *Tech Systems. v. Pyles*, No. 1:12-CV-374 (GBL/JFA), 2013 U.S. Dist. LEXIS 110636, at \*19 n.4 (E.D. Va. Aug. 6, 2013).

11. Ms. Garon seeks fees at the rate of \$460/hour. Ms. Garon has approximately 46 years of experience as an attorney and much of her career has been focused on litigating complex cases in the federal courts.

12. Under the *Vienna Metro* Matrix Ms. Garon would be entitled to a rate of \$505-820 per hour.

13. Given the extent and nature of Ms. Garon's legal experience, my knowledge of her work as an attorney, and my knowledge of the rates charged by other attorneys performing similar work in the Eastern District of Virginia I believe that Ms. Garon's proposed rate is appropriate and reasonable.

14. I am not being compensated for providing this Declaration and I am not seeking fees in this litigation.

I declare under the penalty of perjury that the foregoing is true and correct.

Executed on November 7, 2019

/s/Nina Y. Ren

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Nina Y. Ren